

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

KEVONNA MICHELLE YOUNG,

PLAINTIFF,

v.

**INSTANT BRANDS, INC., and DOUBLE
INSIGHT, INC., d/b/a INSTANT POT
COMPANY,**

DEFENDANTS.

CASE NO. 1:19-cv-04461

JUDGE WILLIAM M. RAY, II

**DEFENDANT INSTANT BRANDS INC.'S RESPONSES AND OBJECTIONS TO
PLAINTIFF'S SUPPLEMENTAL INTERROGATORY REGARDING OTHER
SIMILAR INCIDENTS**

COMES NOW Defendant, Instant Brands Inc. ("Defendant" or "Instant Brands Inc."), Defendant in the above-styled civil-action, and pursuant to F.R.C.P. 33, and hereby responds to Plaintiff's Supplemental Interrogatory Regarding Other Similar Incidents as follows:

RESPONSES AND OBJECTIONS

INTERROGATORY NO. 24: Identify each complaint, claim or incident in which it is alleged that a person was burned in connection with the use of one of your pressure cookers when the lid of the cooker blew off or was removed while the unit was still pressurized. For each such complaint, claim or incident:

- a. Describe the complaint, claim or incident with sufficient particularity that Plaintiff can locate it and can understand how it came to your attention;
- b. State the date on which you first became aware of the complaint, claim or incident and how you became aware of it;

c. State the details of the complaint, claim or incident, including without limitation the identity of the person(s) involved, a description of what allegedly occurred, and the pressure cooker model allegedly involved;

d. If any defect in your pressure cooker was alleged in the complaint, claim or incident, state the nature of the alleged defect;

e. If the complaint, claim or incident was in the form of a lawsuit, identify the court, case caption, and docket number; and

f. If you contend any complaint, claim or incident is *not* substantially similar to Plaintiff's claims in this lawsuit, state all of the facts and identify all of the documents that support your contention.

RESPONSE: Defendant objects to this Interrogatory on grounds that it is overly broad, unduly burdensome, and seeking information that is neither relevant to the claims or defenses of any party nor proportional to the needs of this case. Defendant further objects on grounds that the Interrogatory seeks information regarding products and/or models other than Plaintiff's specific model, the IP-LUX60 V3, which are not at issue in this case and are not relevant to the case. Defendant further objects on grounds this Interrogatory is not reasonably limited in time or scope or tailored to the specific issues in this case. Defendant further objects to the extent this interrogatory seeks information protected by the attorney-client privilege, work-product doctrine and/or prepared in anticipation of litigation. Finally, Defendant objects to these Interrogatories as seeking confidential information regarding persons who are not parties to this action and/or that is protected from disclosure pursuant to the physician/patient privilege and/or federal or

state statutory and regulatory law, including, without limitation, the Health Insurance Portability and Accountability Act of 1996 (HIPAA), 45 C.F.R. § 164.500, et seq.

In addition, Defendant specifically reserves the right to supplement this response at the completion of its review of a large cache of documents that is likely to contain information and documents responsive to this request.

Subject to these objections, Defendant states as follows:

a. For the incidents involving a IP-LUX model during the time period October 7 2015, to October 7, 2017, *see* Bates IBI_000001 produced in Defendant's First Supplemental Disclosures;

b. See response to a., above;

c. See response to a., above;

d. See response to a., above;

e. Defendant is not aware of any lawsuits involving a IP-LUX model during the time period October 7, 2015, to October 7, 2017;

f. The incidents, above, are not substantially similar to Plaintiff's claims in this lawsuit because every claim, including Plaintiff's, appears to involve misuse of the product by the customers. Each incident must be evaluated individually because of the multiple variables involved, including the level of the contents in the cooker, the timing of the cooking cycle, and the location of the float valve, among others, when the lid was removed by the customer.

This 16th day of April, 2021.

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

/s/ Jessica C. Odom

Jessica Cabral Odom
Georgia Bar Number 140935
600 Peachtree Street NE
Suite 4700
Atlanta, Georgia 30308
Telephone: 404.567.6586
Facsimile: 404.467.8845
Jessica.Odom@lewisbrisbois.com

Counsel for Defendant Instant Brands Inc.

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CERTIFICATE OF SERVICE

On April 16, 2021, I served the foregoing **DEFENDANT INSTANT BRANDS INC.’S
RESPONSES AND OBJECTIONS TO PLAINTIFF’S SUPPLEMENTAL
INTERROGATORY REGARDING OTHER SIMILAR INCIDENTS** via email on the
following attorneys of record:

Cale Conley, Esq.
CONLEY GRIGGS PARTIN, LLP
4200 Northside Parkway, NW
Building One, Suite 300
Atlanta, GA 30327
404-467-1155
cale@conleygriggs.com

Michael K. Johnson, Esq.
Kenneth W. Pearson, Esq.
Adam J. Kress, Esq.
JOHNSON BECKER, PLLC
444 Cedar Street, Suite 1800
St. Paul, MN 55101
mjohnson@johnsonbecker.com
kpearson@johnsonbecker.com
akress@johnsonbecker.com

Attorneys for Plaintiff

**LEWIS BRISBOIS BISGAARD &
SMITH LLP**

/s/ Jessica C. Odom

Jessica Cabral Odom
Georgia Bar Number 140935
600 Peachtree Street NE
Suite 4700
Atlanta, Georgia 30308
Telephone: 404.567.6586
Facsimile: 404.467.8845
Jessica.Odom@lewisbrisbois.com

Counsel for Defendant Instant Brands Inc.